

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

INTELLECTUAL VENTURES I LLC,

Plaintiff,

v.

T-MOBILE USA, INC., T-MOBILE US,
INC., ERICSSON INC., and
TELEFONAKTIEBOLAGET LM
ERICSSON,

Defendants.

Civil Action No. 2:17-cv-00577-JRG

JURY TRIAL DEMANDED

FILED UNDER SEAL

**DECLARATION OF NISHA N. PATEL IN SUPPORT OF PLAINTIFF'S OPPOSITION
TO DEFENDANTS' *DAUBERT* MOTION TO STRIKE PORTIONS OF THE VALIDITY
REPORT OF DR. TIM A. WILLIAMS**

I, Nisha N. Patel, declare as follows:

1. I am over the age of eighteen, and I am competent to make this declaration. I provide this declaration based upon my personal knowledge. I would testify to the facts in this declaration under oath if called upon to do so.

2. I am an attorney with the law firm Dechert LLP, attorneys of record for Intellectual Ventures I LLC ("Intellectual Ventures" or "IV"). I am submitting this declaration in support of the above-captioned brief.

3. Attached hereto as Exhibit A is a true and correct copy of the Expert Report of Dr. Tim A. Williams Regarding the Validity of U.S. Patent Nos. 6,628,629, 7,412,517, and RE46,206.

4. Attached hereto as Exhibit B is a true and correct copy of excerpts from the Expert Report of Dr. Anthony Acampora Regarding Invalidity of the Asserted Claims.

5. Attached hereto as Exhibit C is a true and correct copy of excerpts from the Expert Report of Prof. Stephen B. Wicker on the Non-Infringement of U.S. Patent Nos. 6,628,629, 7,412,517, 7,359,971 and RE46,206.

6. Attached hereto as Exhibit D is a true and correct copy of U.S. Patent No. 7,412,517.

7. Attached hereto as Exhibit E is a true and correct copy of U.S. Patent No. RE46,206.

8. Attached hereto as Exhibit F is a true and correct copy of U.S. Patent No. 6,628,629.

9. Attached hereto as Exhibit G is a true and correct copy of U.S. Patent No. 7,359,971.

10. Attached hereto as Exhibit H is a true and correct copy of Intellectual Venture's Supplemental Infringement Contentions Chart for U.S. Patent No. 6,628,629.

11. Attached hereto as Exhibit I is a true and correct copy of excerpts from the deposition of Dr. Anthony Acampora, taken November, 14, 2018.

12. I declare under penalty of perjury under the laws of the United States of America and laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 4th day of December, 2018 in Mountain View, California.

/s/Nisha N. Patel
Nisha N. Patel